

1700 G Street NW,  
Washington, DC 20552

August 8, 2019

**Via ECF**

The Honorable Thomas I. Vanaskie, Special Master  
U.S. District Court, Middle District of Pennsylvania  
William J. Nealon Federal Bldg. & U.S. Courthouse  
235 N. Washington Avenue  
Scranton, PA 18503



Re: *CFPB v. Navient Corp., et al.*, Case No. 3:17-CV-00101-RDM

Dear Judge Vanaskie:

The Bureau respectfully moves for an 8-day extension of time, through August 16, 2019, to submit one of its expert reports.

As Your Honor is aware, the deadline for the Bureau to submit its expert reports is today. The Bureau has been working with its experts diligently to meet the deadline, and will be prepared to send reports from five of its six experts to Defendants' counsel later today. Our sixth expert – who is handling the data analysis and call sampling work – ran into a severe technical issue with his firm's computers over the past couple of days, such that the voluminous data that they have been analyzing for the past several months is now causing their computers to crash. They had hoped to resolve the issue in time to make the final adjustments to their figures so that the report could be finalized today, but as of now, they have been unable to determine the source of the technical problem. Given the volume of data, and the length of time it takes for queries to run under normal circumstances, isolating and remedying the problem is complex. And even if the issue were resolved now, because of the processing time it takes to run queries, we have reached the point where it would be too late to make the final adjustments to the report by today.

The expert has estimated that the technical issue will be resolved, and the final figures can be calculated, by no later than Friday, August 16. Accordingly, we are seeking an eight-day extension of time, through Friday, August 16, to submit this one expert report.

The Bureau believes that there is good cause to grant this request. This issue was unanticipated, and had it not occurred (or even if it had occurred in a manner that could be more easily remedied), the Bureau would have been prepared to submit this sixth expert report today. In addition, Defendants' counsel has indicated that they consent to the request.

Accordingly, the Bureau respectfully requests that the Court grant this request for an eight-day extension of time to submit one of its expert reports.

Respectfully submitted,  
/s/ Nicholas Jabbour